UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

In re POLYURETHANE FOAM ANTITRUST LITIGATION)))) MDL Docket No. 2196
This document relates to:) Index No. 10-MD-2196 (JZ)
ALL DIRECT PURCHASER CLASS AND INDIRECT PURCHASER CLASS CASES)))

STIPULATION AND MOTION TO SUSPEND LITIGATION AGAINST DOMFOAM INTERNATIONAL, INC., VALLE FOAM INDUSTRIES (1995) INC. AND A-Z SPONGE & FOAM PRODUCTS LTD.

Whereas, Direct Purchaser Class Plaintiffs, Indirect Purchaser Class Plaintiffs and Domfoam International, Inc. ("Domfoam"), Valle Foam Industries (1995) Inc. ("Valle"), and A-Z Sponge & Foam Products Ltd. ("A-Z"), have entered into Voluntary Dismissal and Settlement Agreements as of January 3, 2012 (the "Agreements"); and

Whereas, pursuant to the terms of the Agreements, the parties are to submit to this Court a joint request for an order suspending the litigation proceedings against Domfoam, Valle and A-Z; and

Whereas, subject to approval of this Court, the parties stipulate and request that this Court enter an Order suspending all proceedings as scheduled against Domfoam, Valle and A-Z subject to the parties' obligations pursuant to the Agreements to submit documentation to the Court in support of preliminary and final approval of the Settlement.

Dated: January 10, 2012

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IT IS SO ORDERED.

Dated: January ____ 2012

JACK ZOUHARY U.S. DISTRICT JUDGE Case: 1:10-md-02196-JZ Doc #: 313 Filed: 01/10/12 3 of 3. PageID #: 5088

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2012, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipts. Parties may access this filing through the Court's system.

/s/ Elliot A. Silver

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